

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**NOTICE OF FILING OF UNDERTAKING
OF RECEIVER PURSUANT TO JULY 14, 2022 ORDER**

PLEASE TAKE NOTICE that Michael Fuqua, as receiver (the “Receiver”) for Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc. (collectively, the “Receivership Entities”), by and through his undersigned counsel, respectfully submits the *Undertaking of Receiver Pursuant to July 14, 2022 Order*, which is attached as **Exhibit A**, on behalf of himself, as Receiver, and the Receivership Entities, in accordance with the *Order* (Doc. 270) entered by the United States District Court for the Southern District of New York on July 14, 2022.

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Dated: July 19, 2022
New York, New York

Respectfully submitted,

REED SMITH LLP

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- and -

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*Counsel for Michael Fuqua, in his capacity as
Receiver of Theia Group, Inc., Theia Aviation LLC,
and Theia Holdings A, Inc.*